

Law Office of Angus James Bell

30 Wall Street, 8th Floor New York, New York 10005

Tel: (212) 804-5765 Fax: (718) 504-6351

Email: ajamesbelllaw@gmail.com

March 17, 2021

Via ECF

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Sentencing is adjourned to May 25, 2021 at
11:00 a.m. SO ORDERED.



3/18/2021

Re: *United States v. Daniel Daniel, 20Cr101*

Dear Judge Preska:

Yusuf Elashmawy and I are the CJA appointed counsels for Daniel Daniel and write this letter with the consent of the Government to request an adjournment of Mr. Daniel's upcoming sentencing hearing that is scheduled for March 30, 2021. After consulting with the Court's staff, I understand that May 25th or a date thereafter is available on the Court's calendar for this purpose.

Should the Court grant our request, this time will allow counsel to continue to confer with our client regarding the recently received final presentence report, allow Mr. Daniel to continue his required medical treatments, and will provide the necessary time to gather meaningful mitigation materials that are essential to our sentencing submission. Please know that we have also consulted with Mr. Daniel regarding this request and he believes that his interests are best served if we have the additional time to prepare for sentencing.

Thank you in advance for any and all consideration of this request. We will await further instructions from the Court on this matter.

Respectfully submitted,


A. James Bell
A James Bell, Esq.

Cc: All counsel, by ECF